

## **EXHIBIT 2**

**Kry, Robert**

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**From:** Kry, Robert  
**Sent:** Wednesday, June 17, 2015 9:32 AM  
**To:** Carter, Sean; Robert Haefele; WTC[jkreindler@kreindler.com]; WTC[amaloney@kreindler.com]; WTC[jgoldman@andersonkill.com]; Tarbutton, J. Scott  
**Cc:** WTC[mm@martinmcmahonlaw.com]; William Fox (wf@martinmcmahonlaw.com); Nitz, Eric  
**Subject:** RE: Meet and Confer

Sean,

We could be available for this at 11 a.m. on Wednesday, July 1, Monday, July 6, or Wednesday, July 8. Please let us know if any of those dates work. I assume we will do this by phone again? As you propose below, any specifics you could provide in advance of the call would be helpful.

Best regards,

Robert

**Robert K. Kry**



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**From:** Carter, Sean [<mailto:SCarter1@cozen.com>]  
**Sent:** Tuesday, June 16, 2015 8:59 AM  
**To:** Kry, Robert; WTC[mm@martinmcmahonlaw.com]  
**Cc:** Robert Haefele; WTC[jkreindler@kreindler.com]; WTC[amaloney@kreindler.com]; WTC[jgoldman@andersonkill.com]; Tarbutton, J. Scott  
**Subject:** Meet and Confer

Robert and Marty:

Although our analysis of Dallah Avco's document production remains ongoing, there are a few preliminary issues we would like to discuss with you at your earliest convenience. To that end, please let us know when you would be available to meet and confer with plaintiffs' counsel over the next few weeks. For scheduling purposes, it would be helpful if you could provide a handful of viable dates.

We will provide a more detailed summary of the issues we want to discuss in advance of the meeting, but in general would anticipate that the areas of discussion would include the following:

1. The scope of Dallah Avco's remaining confidentiality designations. Although Dallah Avco has withdrawn its confidentiality designations as to a handful of documents, the overwhelming majority of the documents remain

subject to such designations. We believe the confidentiality designations should be withdrawn as to many additional documents.

2.The scope of Dallah Avco's search. Now that Dallah Avco has indicated that it has completed producing documents, we are in a better position to evaluate the adequacy of the underlying searches and Dallah Avco's approach to defining relevancy. We will identify specific areas of focus in advance of the meeting.

3.Omitted records. We have identified a few cases in which documents included in Dallah Avco's production reference attachments or other documents that have not been produced.

Thanks in advance. Sean



**Sean P. Carter**  
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**Please note:** Effective June 29, 2015 our Philadelphia office is relocating. Our new address will be: Cozen O'Connor, One Liberty Place, 1650 Market St., Philadelphia, PA 19103. Telephone and facsimile numbers will remain the same.

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